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6 MOHAMMED YOUSEF CHAUDHRY

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA, No. CR 03-40210 SBA (WDB)

12 Plaintiff, SUPPLEMENTAL APPLICATION FOR
13 v. ORDER AUTHORIZING SUBPOENAS

14 MOHAMMED YOUSEF CHAUDHRY,

15 Defendants. /

16 I, Erik Babcock make the following declarations under penalty of perjury:

17 1) I am an attorney duly admitted to practice in this court, and I was appointed pursuant
18 to the provisions of the Criminal Justice Act to represent defendant Mohammed Yusef Chaudhry in
19 the above captioned case.

20 2) I am informed and believe, and on the basis of said information and belief allege, that
21 Mr. Chaudhry is unable to pay for witness fees and costs of service in connection with issuance of
22 subpoenas for the following persons.

23 3) I filed an application for subpoenas for these witnesses earlier today, on May 28,
24 2008. My prior application did not describe the proposed testimony sought from each witness.
25 This application seeks to supplement set forth the relevance and materiality of each witness's
26 testimony by describing the same below:

27 a. Anthony Armentano: Mr. Armentano can testify concerning his investigation of
28 Clarence Walker, including Walker's accessing IRS databases, and evidence collected

- 1 from Walker's trash, and related investigation of defendant;
- 2 b. Wes Pohl: IRS Disclosure Office, Oakland, California. Defendant seeks Mr. Pohl's
- 3 testimony concerning procedures for storing, requesting, and disclosing taxpayer
- 4 documents;
- 5 c. John Quigley: IRS Disclosure Office, Oakland, California. Defendant seeks Mr.
- 6 Quigley's testimony concerning his response to a subpoena for documents served on
- 7 the IRS Disclosure Office in the instant matter.
- 8 d. Mike Jenkins: IRS Small Business Compliance unit in San Jose. Defendant seeks the
- 9 testimony of Mr. Jenkins concerning Clarence Walker's investigation of defendant.
- 10 e. Janice Tobin: IRS Small Business Compliance unit. Defendant seeks Ms. Tobin's
- 11 testimony concerning business documents related to the Title 31 program and her
- 12 unit's investigation of defendant.
- 13 f. Fern Martin: Territory Manager, IRS Small Business unit. Defendant seeks Ms.
- 14 Martin's testimony concerning the termination of Clarence Walker's employment with
- 15 the IRS, related to the investigation of Walker for crimes committed with Radu
- 16 Tomescu and Sheila Wu.

17 WHEREFORE, defendant prays that an order issue:

- 18 1) Authorizing the issuance of the attached subpoenas.
- 19 2) Authorizing the costs of witness fees and expenses associated with service of said
- 20 subpoenas to be paid as if subpoenaed by the government.
- 21 3) Ordering the U.S. Marshal's Service to serve said subpoenas.

22 Respectfully submitted,

23 LAW OFFICES OF ERIK BABCOCK

24 DATED: May 28, 2008

25 By: /S/Erik Babcock
26 ERIK BABCOCK

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